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4 January 2000

Ms. Peggy Hendrixson (MCC-10J)  
Contracting Officer  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

DOCUMENT CONTROL

U.S. EPA Contract No.: 68-W7-0026

Work Assignment No.: 033-RICO-0167, GE/Housatonic River

Document Control No.: RFW033-3A-AEHE

Subject: Additional Consent Documentation, Biota (Corn Stalk) Analysis

Reference: Request for Consent for Pacific Analytical

Dear Ms. Hendrixson:

This letter and attachments serve as clarification/justification for the added analytical services requested of Pacific Analytical for PCB analysis of corn stalks and ears. The cost of this analysis was not included in the original Request for Consent for analytical services from Pacific Analytical. Pacific Analytical was selected to perform the analysis of the corn stalk samples collected in September based on the following:

1. They have the necessary grinding equipment (Hobert Grinder) for processing the woody corn stalks and ears. The other laboratories that we have used for PCB analysis for this project (STL, E & E, Onsite) did not have the equipment available to allow them to easily and effectively homogenize these samples in preparation for extraction.
2. Pacific Analytical has significant experience in the analysis of vegetation and tissue samples for organic analysis as a result of their on-going analytical work for the FDA. Their chemists are familiar with the specialized techniques and methodologies necessary to minimize the interference's present in tissue samples.
3. Pacific Analytical has the capacity to perform the analysis on the quick turnaround schedule (14 days) if required.

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RFW033-3A-AEHE

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4. Pacific Analytical has been involved with the program since early in the year, and is familiar with the QC and QAPP requirements. Experience with the project QC and deliverable requirements are project specific.

The attachment includes the following additional documents:

- Copy of work plan task which includes the analysis of vegetation
- E-mail copy of procedures for handling corn stalk samples, sent from WESTON to Pacific Analytical
- Faxed quotation from Pacific Analytical for the corn stalk analysis
- Price justification memo and invoice documents.

Thank you in advance for your time and consideration regarding this additional consent material. Please call me at your (847) 918-4013 if you have any questions or you need further information.

Very truly yours,

ROY F. WESTON, INC.

Dean F. Geers  
Program Manager

DFG:me

Attachments

Cc: G. Noakes, WESTON

**4.2.8 Analyze Biota Samples**

- This task includes the analysis of 42 macro invertebrate samples for total PCBs, PCB congeners, and Percent Lipids. The analysis will be performed by the Brehm Research Laboratories of Wright State University. Full documentation (CLP-type) deliverables will be provided for these samples.
- This cost also includes the analysis of vegetation (crop) samples for total PCBs. Costs are based on analysis of 10 corn cob cornstalk samples (+ QC) at Pacific Analytical and 5 whole squash plus 5 edible portion (flesh) at STL. Analysis will be performed on a 14-day turnaround with full documentation deliverables.

Description	Number of Samples	Unit Cost (\$)		Total Cost (\$)
		Soil/ Sediment	Water	
Benthic Toxicity - Macro invertebrates				
Total PCB, PCB Congeners, % Lipids	42	600.00		25,200
Total Costs - <del>Biological</del> Macro invertebrate				\$25,200
Vegetation				
Corn (stalks and ears)	22	250.00		5,500
Squash (whole, flesh, pulp, seeds)	10	200.00		2,000
Total Cost - Vegetation				7,500
Total Task 4.2.8 Biota				\$32,700

**4.2.9 Analyze Bioassay Samples**

This task is not applicable to this work assignment at this time.

**4.2.10 Perform Bioaccumulation Studies**

This task is not applicable to this work assignment at this time.

**TASK 5 - ANALYTICAL SUPPORT AND DATA VALIDATION (20064-033-100-50XX)**

WESTON will arrange for the analysis of environmental samples for the analytical parameters and numbers of samples identified in Task 4. This task includes the following activities: